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PARAMOUNT GLOBAL

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JOSEPH RAYHBUCK p/k/a FAT CODA STUDIOS, an individual, and WATCHDOG AI, INC., a California corporation,

CASE NO: 2:25-cv-01605-JLS-AJR_x

**STIPULATION TO ORDER
DISMISSING ACTION WITH
PREJUDICE**

Plaintiffs,
v.
PARAMOUNT GLOBAL, a Delaware corporation,

[Proposed] Order submitted herewith

Assigned to the Hon. Josephine L. Staton

Defendant.

Action Filed: February 25, 2025

Plaintiffs JOSEPH RAYHBUCK p/k/a FAT CODA STUDIOS and WATCHDOG AI, INC. (collectively, "Plaintiffs") and Defendant PARAMOUNT

1 GLOBAL (“Defendant”), through their respective counsel, hereby enter the following
2 stipulation respecting Plaintiff’s filing of a First Amended Complaint and Defendant’s
3 filing of a response thereto. This Stipulation is based upon the following:

4 WHEREAS, Plaintiffs filed their initial Complaint on February 25, 2025
5 (Dkt. 1);

6 WHEREAS, Plaintiffs effected service of the Complaint on Defendant on March
7 4, 2025 (Dkt. 15);

8 WHEREAS, the Parties entered into a settlement agreement to resolve this
9 action;

10 WHEREAS, on July 24, 2025, this Honorable Court dismissed this action
11 without prejudice, with the Parties to bear their respective attorneys’ fees and costs,
12 and for the Court to retain jurisdiction pending the Parties’ completion of their
13 settlement (Dkt. 26); and

14 WHEREAS, Defendant has complied with its obligations under the settlement
15 agreement.

16 Based on the foregoing, the Parties hereby stipulate as follows:

17 1. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the Parties, through their
18 respective attorneys of record, stipulate to the entry of the accompanying Order
19 dismissing this action, in its entirety, with prejudice, and with Plaintiffs, on the one
20 hand, and Defendant, on the other hand, to bear their respective attorneys’ fees and
21 costs.

22 Dated: August 8, 2025 VALKYRIE LAW GROUP, P.C.

23 HEATHER L. BLAISE, ESQ.

24 By: /s/ Heather L. Blaise

25 Attorneys for Plaintiffs

27 Dated: August 8, 2025 KATTEN MUCHIN ROSENMAN LLP

28 DAVID HALBERSTADTER

1 By: /s/ David Halberstadter

2 Attorneys for Defendant

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5 I, Heather L. Blaise, hereby attest that all other signatories listed above, on

6 whose behalf this filing is submitted, concur in the filing's content and have authorized

7 the filing.

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